

### **REMARKS/ARGUMENTS**

The Applicant originally submitted Claims 1-40 in the application. In the present response, the Applicants have amended independent Claims 1, 11, 21, and 31. Support for the amendment can be found on page 12, line 21, to page 13, line 17, and Figures 1-3 of the original specification. No claims have been cancelled or added. Accordingly, Claims 1-40 are currently pending in the application.

#### **I. Rejection of Claims 1, 3, 5-9, 11, 13, 15-19, 21, 23, 25-29, 31, 33, 35-38, and 40 under 35 U.S.C. §102**

The Examiner has rejected Claims 1, 3, 5-9, 11, 13, 15-19, 21, 23, 25-29, 31, 33, 35-38, and 40 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,878,130 to Andrews, *et al.* The Applicant respectfully disagrees since Andrews does not teach a circuit-switched matrix and line interface configured to provide a sole interface between a plurality of access nodes and a main control unit (MCU) wherein each connection between the access nodes and the MCU traverses the circuit-switched matrix and line interface as recited in amended independent Claims 1, 11, 21, and 31.

Andrews discloses a central controller, represented by 30A and 30B, coupled to a call service center 501 through a WAN interface 472 included therein. The call service center 501 also includes a status/control process 504 wherein status/control process 504 transmits control signals to the inbound telephone network 68, the outbound telephone network 68', and the switching matrix 506 for providing a request service to or from callers 18 and or 20. (*See* column 14, lines 5-47 and

Figure 12.) The Examiner asserts that the callers 18, 20, equate to the access nodes and asserts that the central controller 30A, 30B, or more specifically, the primary central controller (PCC) 30 equates to the MCU as recited in Claims 1, 11, 21 and 31, respectively. (See Examiner's Action, pages 2-3.)

Additionally, the Examiner asserts that the call service center 501 provides similar functionalities as the circuit-switched matrix and line interface unit as recited in Claims 1, 11, 21 and 31. (See Examiner's Action, pages 2-3 and 13.)

The call service center 501, however, does not provide the sole interface between the central controller 30A, 30B, and the callers 18, 20. More specifically, each connection between the central controller 30A, 30B, and the callers 18, 20, does not traverse through the call service center 501. On the contrary, as evident from Figure 12, there are multiple paths between the central controller 30A, 30B, and the callers 18 and 20. One path between the central controller 30A, 30B, and callers 18 and 20 does traverse through the call service center 501. *But there is also a path directly between the central controller 30A, 30B, and the public network 1 to the callers 18 and 20 which does not traverse call service center 501.* As such, the call service center 501 is not the sole interface between the central controller 30A, 30B, and the callers 18, 20.

Unlike the invention as presently claimed, Andrews provides multiple paths between the main control unit and subscribers. This differs from the present invention that advantageously employs the circuit switched matrix and line interface in each path between access nodes and the MCU. Andrews clearly discloses multiple paths as discussed above. In the invention as presently claimed the circuit-switched matrix and line interface is, in all cases, in the path between an access node and an MCU.

Therefore, Andrews does not disclose each and every element of amended independent Claims 1, 11, 21, and 31 and as such, is does not anticipate independent Claims 1, 11, 21, and 31 and Claims dependent thereon. Accordingly, the Applicant respectfully requests the Examiner to withdraw the §102 rejection with respect to Claims 1, 3, 5-9, 11, 13, 15-19, 21, 23, 25-29, 31, 33, 35-38, and 40 and allow issuance thereof.

## **II. Rejection of Claims 2, 10, 12, 20, 22, 30, 32, and 39 under 35 U.S.C. §103**

The Examiner has rejected Claims 2, 10, 12, 20, 22, 30, 32, and 39 under 35 U.S.C. §103(a) as being unpatentable over Andrews in view of U.S. Patent Application No. 2003/0128698 by Darland, *et al.* The Applicant respectfully disagrees.

As discussed above, Andrews does not teach each element of independent Claims 1, 11, 21, and 31. Additionally, Andrews does not suggest providing a sole interface between a plurality of access nodes and a main control unit wherein each connection between the access nodes and the MCU traverses the circuit-switched matrix and line interface as recited in independent Claims 1, 11, 21, and 31. Instead, Andrews discloses providing multiple paths between callers and central controllers. (*See* Figure 12.) Thus, Andrews does not teach or suggest each element of amended independent Claims 1, 11, 21, and 31.

Darland relates to telecommunications network processing of services. (*See* paragraph 2.) The Applicant does not find where Darland cures the above deficiencies of Andrews nor has Darland been cited to cure the deficiencies of Andrews. The cited combination of Andrews and Darland, therefore, does not provide a *prima facie* case of obviousness of amended independent

Claims 1, 11, 21, and 31 and Claims 2, 10, 12, 20, 22, 30, 32, and 39 that depend thereon. Accordingly, the Applicant respectfully requests the Examiner to withdraw the § 103(a) rejection of dependent Claims 2, 10, 12, 20, 22, 30, 32, and 39 and allow issuance thereof.

### **III. Rejection of Claims 4, 14, 24, and 34 under 35 U.S.C. §103**

Previously, the Examiner rejected Claims 4, 14, 24, and 34 under 35 U.S.C. § 103(a) as being unpatentable over Andrews in view of U.S. Patent No. 6,614,783 to Sonesh, *et al.* The Applicant respectfully disagrees.

As discussed above, Andrews does not teach or suggest each element of amended independent Claims 1, 11, 21, and 31. Sonesh relates to telephone automatic call distribution for call centers and particularly to a geographically distributed multimedia automatic call distribution system connected to a plurality of voice and data networks. (*See* column 1, lines 13-19.) Sonesh has not been cited to cure the deficiencies of Andrews and the Applicant does not find where Sonesh cures the above deficiencies of Andrews. The cited combination of Andrews and Sonesh, therefore, does not provide a *prima facie* case of obviousness of amended independent Claims 1, 11, 21, and 31 and Claims 4, 14, 24, and 34 that depend thereon. Accordingly, the Applicant respectfully requests the Examiner to withdraw the § 103(a) rejection of dependent Claims 4, 14, 24, and 34 and allow issuance thereof.

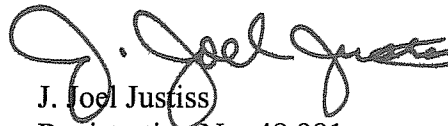
## Conclusion

In view of the foregoing amendment and remarks, the Applicant now sees all of the Claims currently pending in this application to be in condition for allowance and therefore earnestly solicits a Notice of Allowance for Claims 1-40.

The Applicant requests the Examiner to telephone the undersigned attorney of record at (972) 480-8800 if such would further or expedite the prosecution of the present application. The Commissioner is hereby authorized to charge any fees, credits or overpayments to Deposit Account 08-2395.

Respectfully submitted,

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